

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DROPBOX, INC.,

*Plaintiff/Counter-Defendant,*

v.

MOTION OFFENSE, LLC,

*Defendant/Counter-Plaintiff.*

CIVIL ACTION NO. 6:20-cv-00251-ADA

MOTION OFFENSE, LLC

*Plaintiff,*

v.

DROPBOX, INC.,

*Defendant.*

CIVIL ACTION NO. 6:21-cv-00758-ADA

**DECLARATION OF SRIKANT CHERUVU IN SUPPORT OF  
MOTION OFFENSE, LLC'S OPPOSITION TO DROPBOX, INC.'S MOTION  
TO STRIKE AMENDED INFRINGEMENT CONTENTIONS**

Dated: July 20, 2022

Timothy Devlin (No. 4241)  
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*Attorneys for Plaintiff  
Motion Offense, LLC*

I, Srikant Cheruvu, hereby declare:

1. I am an attorney admitted to practice in New York, and have been admitted pro hac vice in this action. I am an attorney at the Devlin Law Firm LLC, counsel for Motion Offense LLC (“Motion Offense”) in the above-captioned actions. I provide this declaration in support of Motion Offense, LLC’s Opposition to Dropbox Inc.’s Motion to Strike Motion Offense LLC’s July 1 Amended Infringement Contentions.

2. Unless otherwise indicated below, the statements in this declaration are based on my personal knowledge and my review of the documents cited herein. If called to testify as a witness, I could and would competently do so under oath.

3. Attached as Exhibit 1 is a comparison of exemplary folder sharing limitations of U.S. Patent No. 10,013,158 (the “’158 patent”) with exemplary folder sharing limitations of U.S. Patent No. 11,044,215 (the “’215 patent”).

4. Attached as Exhibit 2 is a comparison of exemplary file request limitations of U.S. Patent No. 10,021,052 (the “’052 patent”) with exemplary file request limitations of the ’215 patent.

5. Attached as Exhibit 3 are excerpts from the June 29, 2022 deposition of Maxime Larabie-Belanger.

6. Attached as Exhibit 4 are excerpts from the June 30, 2022 deposition of Deborah Holstein.

7. Attached as Exhibit 5 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000062775.

8. Attached as Exhibit 6 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000025446.

9. Attached as Exhibit 7 are excerpts from Motion Offense's October 15, 2021 and July 1, 2022 infringement contentions for the '158 and '215 patents showing exemplary steps for team folder sharing and personal folder sharing with Dropbox.

10. Attached as Exhibit 8 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000059559.

11. Attached as Exhibit 9 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000036453.

12. Attached as Exhibit 10 is a true and correct copy of a document Bates-numbered MOTIONOFFENSE0002417.

13. Attached as Exhibit 11 are excerpts from Motion Offense's October 15, 2021 and July 1, 2022 infringement contentions for the '215 patent, showing the operation of the Dropbox desktop application.

14. Attached as Exhibit 12 is a true and correct copy of an email thread between L. Herriot and S. Cheruvu on or around April 19, 2021.

15. Attached as Exhibit 13 are excerpts from Dropbox's Sixth Supplemental Objections and Responses to Motion Offense, LLC's First Set of Interrogatories (Nos. 1-10), dated July 1, 2022.

16. Attached as Exhibit 14 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000059757.

17. Attached as Exhibit 15 are excerpts from the June 10, 2022 deposition of Sarah Schubach.

18. Attached as Exhibit 16 is a true and correct copy of Exhibit 32 to the June 29, 2022 deposition of Maxime Larabie-Belanger.

19. Attached as Exhibit 17 is a true and correct copy of a document Bates-numbered DRBX\_MoOff\_000051676-87.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 20, 2022.

A handwritten signature in blue ink, appearing to read "Srikant Cheruvu", with a horizontal line underneath.

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Srikant Cheruvu